

1 PATRICK D. ROBBINS (CABN 152288)
 2 Acting United States Attorney

3 MARTHA BOERSCH (CABN 126569)
 4 Chief, Criminal Division

5 MAUREEN C. BESSETTE (CABN 165775)
 6 Assistant United States Attorney

7 1301 Clay Street, Suite 340S
 8 Oakland, California 94612
 Telephone: (510) 637-3680
 FAX: (510) 637-3724
 MAUREEN.BESSETTE@USDOJ.GOV

9 Attorneys for United States of America

FILED

Apr 29 2025

Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,) CASE NO. 4:25-mj-70481
14 Plaintiff,) AMENDED NOTICE OF PROCEEDINGS ON
15 v.) OUT-OF-DISTRICT CRIMINAL CHARGES
16 WILLIAM J. O'REILLY,) PURSUANT TO RULES 5(c)(2) AND (3) OF THE
17 a/k/a WILLIAM J. O'REILLY JR) FEDERAL RULES OF CRIMINAL PROCEDURE
18 Defendant.)

19
 20 Please take notice pursuant to Rules 5(c)(2) and (3) of the Federal Rules of Criminal Procedure
 21 that on April 28, 2025, the above-named defendant was arrested pursuant to an arrest warrant (copy
 22 attached) issued upon a

- 23 Indictment
 24 Information
 25 Criminal Complaint
 26 Other (describe) _____

27 pending in the Northern District of New York, Case Number 8:25-MJ-72 (GLF).

28 In that case (copy of complaint attached), the defendant is charged with a violation of Title 8,

1 U.S.C. § 1324(a)(1A)(v)(1).

2 Description of Charges: Conspiracy to Bring Aliens.

3 The maximum penalties are as follows: 10 years' imprisonment, \$250,000 fine, 3 years'
4 supervised release, and a \$100 special assessment.

5

6 Respectfully Submitted,

7 PATRICK D. ROBBINS
8 Acting UNITED STATES ATTORNEY

9 Date: April 29, 2025

10 //S//
11 MAUREEN C. BESSETTE
12 Assistant United States Attorney

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Attachment

UNITED STATES DISTRICT COURT
for the
Northern District of New York

United States of America

V.
WILLIAM J. O'REILLY

a.k.a. WILLIAM J. O'REILLY JR.

) Case No. 8:25-MJ-72 (GLF)
)

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay,

(name of person to be arrested) William J. O'Reilly

who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

8 USC 1324(a)(1)(A)(v)(I) - Conspiracy to Bring Aliens into the United States.

Date: MARCH 18, 2025

Gary L. Fauro

Issuing officer's signature

City and state: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date:

Arresting officer's signature

Printed name and title

U.S. DISTRICT COURT – N.D. OF N.Y.

FILED**Mar 18 - 2025**

John M. Domurad, Clerk

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

WILLIAM J. O'REILLY**a.k.a. WILLIAM J. O'REILLY JR.****Defendant.**

Case No. 8:25-MJ-72 (GLF)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

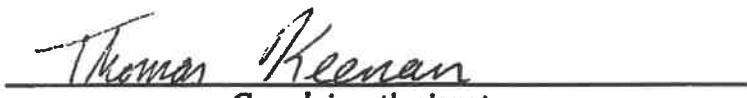
Between on or about October 29, 2024, through on or about November 10, 2024, in the county of St. Lawrence in the Northern District of New York, the defendant violated:

Code Section
8 U.S.C. § 1324(a)(1)(A)(v)(I)

Offense Description
Conspiracy to Bring Aliens

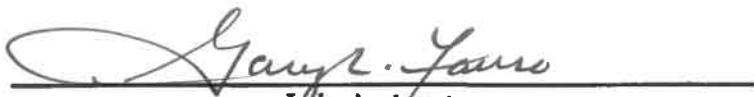
This criminal complaint is based on these facts:

- Continued on the attached sheet.


Thomas Keenan
Complainant's signature
 HSI Special Agent Thomas Keenan

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: MARCH 18, 2025


Gary L. Favro
Judge's signature

City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

Continuation Sheet, *United States v. WILLIAM J. O'REILLY*

This criminal complaint is based on these facts:

On November 13th, 2024, Coconspirator-1 was arrested and charged with 8 U.S.C. § 1324(a)(1)(A)(v)(I)- Conspiracy to Bring Aliens.

Coconspirator-1 stated an individual, whom investigators later determined to be William J. O'REILLY, would contact Coconspirator-1 and other individuals when aliens needed to be smuggled into the United States from Canada. Coconspirator-1 stated individuals who wanted to be smuggled into the United States would contact O'REILLY. In turn, O'REILLY would contact Coconspirator-1 or other un-named coconspirators to arrange smuggling. Coconspirator-1 stated he believed some of the "Irish" (the aliens being smuggled) were involved with criminal activity. Once Coconspirator-1 and other coconspirators transported the aliens to the United States from Canada, the aliens would move to other locations. Coconspirator-1 stated aliens mostly went to New York City, but also said some aliens were transported to Boston.

After obtaining a search warrant for Coconspirator-1's mobile cellular phone, law enforcement uncovered numerous text messages, voice messages, and voice calls between Coconspirator-1 and O'REILLY. In summary, on at least one occasion, O'REILLY informed Coconspirator-1 that he would need to prepare a boat to smuggle aliens from Canada into the United States. Coconspirator-1 would ask O'REILLY how many people would be transported and would make appropriate arrangements for transportation and boat space. Coconspirator-1 was paid in cash for his role. The aliens would have cash on their person when they were smuggled and would give the cash to other coconspirators. Coconspirator-1 would receive cash payment after the fact from coconspirators who received the cash from the aliens.

The investigation has determined, after interviews with additional co-conspirators and reviews of additional cellular phones, that O'REILLY was acting in a leadership role of an alien smuggling enterprise spanning the United States and Canada.